

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 13, 2021

CA2021-895

Ross Johnson  
AT&T Director of Regulatory Relations  
430 Bush Street, 5th Floor  
San Francisco, CA 94108

**SUBJECT:** Audit of AT&T San Diego County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Calvin Choi and Mily Vaidya of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's San Diego County District from April 12, 2021 to April 18, 2021. The audit included a review of AT&T's inspection and maintenance records and a field inspection of AT&T communication facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than October 13, 2021, by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Calvin Choi at (213) 219-3034 or [Calvin.Choi@cpuc.ca.gov](mailto:Calvin.Choi@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC  
Calvin Choi, Utilities Engineer, CPUC

## **AUDIT FINDINGS**

### **I. Records Review**

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- AT&T's Intrusive Inspection of Wood Poles
- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines

## II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

### **GO 95, Rule 31.2, Inspection of Lines**, states in part:

*Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

### **GO 165, Standard III-B, Distribution Facilities, Standards for Inspections**, states in part:

*Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in [Table 1](#).*

AT&T's records indicated that from 2015 to 2020, AT&T failed to perform 295 overhead detailed inspections by AT&T's inspection dates.

### **GO 95, Rule 31.1, Design, Construction and Maintenance**, states in part:

*For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.*

### **GO 95 Rule 18, Resolution of Potential Violations of General Order 95 and Safety Hazards**, states in part:

*Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.*

AT&T's records indicated that for 2020, AT&T completed 228 work orders past their due date for corrective action.

### III. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	20724P73319	Pole	San Diego
2	20717P73312	Pole	San Diego
3	P739257	Pole	San Diego
4	P739260	Pole	San Diego
5	20730J73331	Pole	San Diego
6	P2074773327	Pole	San Diego
7	P2076273321	Pole	San Diego
8	P739274	Pole	San Diego
9	P739273	Pole	San Diego
10	P789256	Pole	San Diego
11	P739555	Pole	San Diego
12	Near 6002 Lomond Dr	Pole	San Diego
13	P479690	Pole	San Diego
14	P479716	Pole	San Diego
15	P2486225	Pole	San Diego
16	P479717	Pole	San Diego
17	P479213	Pole	San Diego
18	P479718	Pole	San Diego
19	P479719	Pole	San Diego
20	P479720	Pole	San Diego
21	P275030	Pole	Jamul
22	828838H	Pole	Jamul
23	Near 14914 Lyons Valley Rd.	Pole	Jamul
24	P177933	Pole	Jamul
25	P74628	Pole	Jamul
26	P30464	Pole	Jamul
27	P678030	Pole	Jamul
28	P74627	Pole	Jamul
29	P977075	Pole	Jamul
30	P74626	Pole	Jamul
31	P103358	Pole	Jamul
32	878271	Pole	Jamul
33	P677233	Pole	Poway
34	P676695	Pole	Poway
35	P676694	Pole	Poway
36	P676696	Pole	Poway
37	P255174	Pole	Poway
38	P676697	Pole	Poway
39	P676909	Pole	Poway

40	P676911	Pole	Poway
41	P676912	Pole	Poway
42	P676913	Pole	Poway
43	P676914	Pole	Poway
44	P672492	Pole	Poway
45	P672491	Pole	Poway
46	P674165	Pole	Poway
47	P674166	Pole	Poway
48	P674167	Pole	Poway
49	P674168	Pole	Poway
50	P674169	Pole	Poway
51	H026247G	Pole	Ramona
52	P239397	Pole	Ramona
53	P239392	Pole	Ramona
54	P254173	Pole	Ramona
55	P811949	Pole	Ramona
56	P811950	Pole	Ramona
57	P811951	Pole	Ramona
58	P136174	Pole	Ramona
59	1033165H	Pole	Valley Center
60	1033164H	Pole	Valley Center
61	1033163H	Pole	Valley Center
62	P717841	Pole	Valley Center
63	1030086H	Pole	Valley Center
64	P717842	Pole	Valley Center
65	1036483H	Pole	Valley Center
66	TP2904	Pole	Valley Center
67	North of TP2904	Pole	Valley Center
68	Two Pole North of TP2904	Pole	Valley Center
69	Three Pole North of TP2904	Pole	Valley Center
70	TP2900	Pole	Valley Center
71	North of TP2900	Pole	Valley Center
72	Two Pole North of TP2900	Pole	Valley Center
73	P175997	Pole	La Mesa
74	P175516	Pole	La Mesa
75	P2491975	Pole	La Mesa
76	71274	Pole	La Mesa
77	P77016	Pole	La Mesa
78	JP171467	Pole	La Mesa
79	271340	Pole	La Mesa
80	P77916	Pole	San Diego
81	P78026	Pole	San Diego
82	JP570200	Pole	San Diego
83	1059310H	Pole	San Diego
84	1059311H	Pole	San Diego

85	P170146	Pole	San Diego
86	Next to P170146	Pole	San Diego
87	P170145	Pole	San Diego
88	JP476224	Pole	San Diego
89	170144	Pole	San Diego
90	476225J	Pole	San Diego
91	P170143	Pole	San Diego
92	P170142	Pole	San Diego
93	1061064H	Pole	Campo
94	1814	Pole	Campo
95	1815	Pole	Campo
96	1061996H	Pole	Campo
97	1045888H	Pole	Campo
98	1812	Pole	Campo
99	1811	Pole	Campo
100	1810	Pole	Campo
101	1809	Pole	Campo
102	1808	Pole	Campo
103	S4197	Pad mount	Campo
104	Next to S4197	Pad mount	Campo
105	HH4197	Handhole	Campo
106	S4183	Handhole	Campo
107	F4207	Pad mount	Campo
108	F4241	Pad mount	Campo
109	F4259	Pad mount	Campo
110	F4277	Pad mount	Campo
111	Near 4289 Quapaw Ave	Handhole	Campo
112	F4335	Pad mount	Campo
113	S4357-2	Pad mount	Campo
114	F4372-2	Pad mount	Campo
115	F4339	Pad mount	Campo
116	Near 4311 Taos Dr	Pad mount	Campo
117	F4287-2	Pad mount	Campo
118	Near 4275 Taos Dr	Pad mount	Campo
119	F4263	Pad mount	Campo
120	F4239	Pad mount	Campo
121	F4215-2	Pad mount	Campo
122	In front of 4209 Taos Dr	Handhole	Campo
123	SD3604	Pad mount	Campo
124	Next to SD3604	Handhole	Campo
125	SD3604-1	Pad mount	Campo
126	F4144	Handhole	Campo
127	Near 4104 Rappa Hannock Ave	Handhole	Campo
128	S4104	Pad mount	Campo
129	Next to S4104	Handhole	Campo

130	HH4104	Handhole	Campo
131	F3636	Pad mount	Campo
132	In front of 8750 Hillery Dr	Pad mount	Mira Mesa
133	Near 8730 Hillery Dr	Pad mount	Mira Mesa
134	8714	Pad mount	Mira Mesa
135	Near 8696 Hillery Dr	Pad mount	Mira Mesa
136	8676	Pad mount	Mira Mesa
137	8656	Pad mount	Mira Mesa
138	8636	Pad mount	Mira Mesa
139	8616	Pad mount	Mira Mesa
140	8606	Pad mount	Mira Mesa
141	7717	Pad mount	Mira Mesa
142	Near 7707 Dancy Dr	Pad mount	Mira Mesa
143	7681	Pad mount	San Diego
144	7657	Pad mount	San Diego
145	Near 10525 Matson Way	Pad mount	San Diego
146	10535	Pad mount	San Diego
147	10565	Pad mount	San Diego
148	10595	Pad mount	San Diego
149	Near 7636 Adkins way	Pad mount	San Diego
150	7654	Pad mount	San Diego
151	Near 7660 Adkins way	Pad mount	San Diego
152	Near 7672 Adkins way	Pad mount	San Diego

#### IV. Field Inspection – Violations List

We observed the following violations during the field inspections:

**GO 95, Rule 31.1, Design, Construction, and Maintenance**, states in part:

*Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

The AT&T facilities on each of the following poles were not maintained for their intended use:

- 20724P73319: there was a loose lashing wire hanging from AT&T lines near this pole.
- P811949: there was a buried down guy anchor attached to the pole.

**GO 95, Rule 56.2, Uses (Guy Wires)**, states in part:

*Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.*

AT&T down guy wire attached to each of the following poles was not taut:

- 20724P73319
- P479213
- P674166

**GO 95, Rule 84.8-C3b: Above Ground in Areas Accessible to Pedestrians Only**, states in part:

*Residential Premises: Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet. EXCEPTION: If the building served does not permit an attachment which will provide this 10 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible but in no case less than 8 feet 6 inches.*

An AT&T service drop attached to pole P2486225 had an above ground clearance of less than 10 feet.

**GO 95, Rule 84.6-B, Ground Wires**, states in part:

*Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet.*

The ground moulding attached to each of the following poles was damaged:

- P677233
- P676914
- 811950
- Pole next to P170146
- P170142

**GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground:**

*Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:*

*b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8.*

The conduit for AT&T riser attached to each of the following poles was damaged or missing:

- 20730J73331
- P2076273321
- P677233
- P676914
- P811949
- P811950
- Pole Next to P170146

**GO 95, Rule 31.6, Abandoned Lines, states:**

*Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.*

AT&T service drops attached to each of the following poles were cut and abandoned:

- Pole north of TP2904
- TP2900
- One pole north of TP2900
- Pole next to P170146